

## REMARKS

Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

### Status of Claims:

No claims are currently being cancelled or added.

Claims 25 and 51 are currently being amended.

This amendment amends claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claims remain under examination in the application, is presented, with an appropriate defined status identifier.

After amending the claims as set forth above, claims 1-53 are now pending in this application.

### Claim Rejections – Prior Art:

In the Office Action, claims 1, 3-6, 8, 9, 11, 12, 14-16, 18-30, 32-34, 36-38, 41-51 and 53 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,359,647 to Sengupta et al. in view of U.S. Patent No. 5,889,550 to Reynolds; claims 2, 7, 31 and 35 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Sengupta et al. and Reynolds as applied to claims 1 and 30 and further in view of U.S. Patent No. 5,267,329 to Ulich et al.; claims 10, 13, 39 and 40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Sengupta et al. and Reynolds as applied to claims 1 and 30 and further in view of U.S. Patent No. 6,005,610 to Pingali; and claims 17 and 52 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Sengupta et al. and Reynolds as applied to claims 1 and 30 and further in view of U.S. Patent No. 5,668,739 to League et al. These rejections are traversed with respect to the presently pending claims, for at least the reasons given below.

In its rejection of independent claims 1 and 30, the Office Action utilizes the teachings of Reynolds with the teachings of Sengupta et al. to assert that those claims are obvious in view of these two references. Applicant respectfully disagrees. Reynolds et al. is directed to a system that determines a precise position of a recording camera 24 by way of a targeting assembly 26 provided on top of the recording camera 24, and by way of a plurality of viewer cameras 48, 49, 50 that provide infrared light that reflects off the targeting assembly and that

is received by the viewer cameras 48, 49, 50. Based on this received reflected light, a precise position of the recording camera 24 can be obtained, so that a recording area of the recording camera 24 can be determined in order to later on provide animated images onto the recording area.

Thus, in Reynolds, the recording camera itself is the target to be determined by a plurality of other (viewer) cameras, whereby a ‘non-camera’ target is not being detected in the system of Reynolds. In Reynolds, it does not determine which of the viewer cameras 48, 49, 50 is the ‘best’ one to determine the exact spatial position of the recording camera, but rather information provided by each of the viewer cameras 48, 49, 50 is utilized together, in order to determine the exact spatial position of the recording camera. This is clearly different from the claimed invention, in which a control means includes assessing means for assessing the spatial orientation of a target and selection means for selecting one camera at least partly upon the assessed spatial orientation. In Reynolds, no such assessment is made, but rather image information provided by each of the viewer cameras 48, 49, 50 is utilized together.

Furthermore, Sengupta et al. describes a procedure in which a target is to be tracked by a plurality of cameras, whereby that procedure is based on the target moving from a field of view of a first camera to a field of view of a second camera. In more detail, this handover is done when the target moves to a field-of-view-boundary between two cameras. In the present invention, on the contrary, such a ‘field-of-view boundary’ procedure as described by Sengupta et al. is not utilized, but rather an image signal is selected by assessing a spatial orientation of a target.

Thus, since Reynolds describes a procedure for tracking a recording camera using information provided by all viewer cameras, and since Sengupta describes a procedure for providing an image of a target based on the target being in a ‘field-of-view’ of one camera of a plurality of cameras, neither reference is relevant to the claimed invention which assess a spatial orientation of a target and selects one camera at least partly upon the assessed spatial orientation.

Accordingly, presently pending independent claims 1 and 30 are patentable over the cited art of record.

The presently pending dependent claims under rejection are patentable due to their dependencies on either base claim 1 or base claim 30, as well as for the specific features

recited in these dependent claims. For example, in its rejection of claim 6, the Office Action asserts that the features recited in that claim are to be found in column 5, lines 30-33 of Sengupta. However, this assertion is incorrect. Namely, claim 6 recites that the determined parameters include at least target location, velocity/speed, and target environment. Column 5, lines 30-33 of Sengupta merely describes that three dimensional modeling provides for greater flexibility and accuracy in the determination of the actual location of the target, but at increased computational costs. With all due respect, this does not teach or suggest the specific features recited in claim 6. Claim 34 recites similar features as a method claim.

With respect to claim 11, that claim recites that a further camera is arranged for viewing substantially all of the predetermined region. The Office Action asserts that column 7, lines 53-56 of Sengupta describes these features, but such an assertion is incorrect. Rather, column 7, lines 53-56 of Sengupta merely describes that cameras are arranged with overlapping fields of view, such that a target cannot exit the field of view of two cameras simultaneously. This does not teach or suggest the specific features recited in claim 11.

Dependent claims 25 and 51 have been amended to include features described in numbered paragraph 0071 of the specification, whereby such features are not disclosed, taught or suggested by the cited art of record.

**Conclusion:**

Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741.

If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

Date September 26, 2005

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